



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

April 28, 1995

CERTIFIED MAIL NO. Z695243757  
RETURN RECEIPT REQUESTED

WARNING LETTER

In reply, refer to H-4-1

Dr. Lawrence Watson  
Chief, Environmental Management  
March Air Force Base  
722 SPTG/CEV  
March AFB, CA 92518

Dear Dr. Watson:

On April 4, 1995, a hazardous waste investigation was conducted by representatives of the United States Environmental Protection Agency (U.S. EPA) at March Air Force Base in Moreno Valley, CA, U.S. EPA Identification Number CA4570024527. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended [42 U.S.C. 6927]. A copy of the investigation report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations and potential violations of the California authorized program under RCRA Subtitle C. Any omissions in the report shall not be construed as a determination of compliance with applicable regulations. The EPA inspectors' overall impression is that the hazardous waste accumulation areas at March Air Force Base are well-maintained and that facility personnel appear to be knowledgeable and cooperative.

Pursuant to Section 3008 of RCRA [42 U.S.C. 6928] you are required to correct the identified areas of noncompliance and to submit documentation of their correction to U.S. EPA within 30 calendar days of your receipt of this letter. Specifically, please, submit the following:

1. Proof/certification that the personnel mentioned in the report have received their hazardous waste annual refresher training (to be completed as expeditiously as possible).
2. Proof/certification that all personnel involved in hazardous waste management will systematically receive hazardous waste annual refresher training when it becomes due.

Your response must include a letter signed by a duly authorized official of your facility, certifying correction of the identified areas of noncompliance. Documentation of your return to compliance may consist of, among other things, photographs, manifests and revised records. Where compliance cannot be achieved within 30 days, you must provide the reasons for the delay, a description of each corrective action planned and a schedule on which each corrective action will be taken.

By copy of this letter, U.S. EPA is providing the State of California with notice of the referenced violations of Subtitle C of RCRA. U.S. EPA is also providing the State with notice that it intends to take appropriate enforcement action if the facility does not resolve the violations within the time specified above and the State does not take appropriate enforcement action. The State of California may notify U.S. EPA of its intent to assume or decline responsibility to take such action to resolve the referenced violations.

U.S. EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. Violations of Subtitle C of RCRA such as those listed in the enclosed report may be punishable by civil and criminal actions, including penalties of up to \$25,000 per day for each violation as provided by Section 3008 of RCRA.

U.S. EPA routinely provides copies of investigation reports to State agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations (40 CFR Part 2). If you believe this report contains privileged or confidential information, you may make a claim within fifteen (15) working days from your receipt of this letter. U.S. EPA will construe your failure to furnish a timely claim as a waiver of the confidentiality claim.

Your response to this Warning Letter, due within 30 days of your receipt of this letter, shall be mailed to:

Mr. Duong Nguyen  
Hazardous Waste Management Division,  
H-4-1  
U.S. EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

If you have questions related to technical aspects of the investigation report or this letter, please contact Duong Nguyen at (415) 744-2130.

Sincerely,

A handwritten signature in cursive script, appearing to read "Arlene Kabei", followed by a horizontal line.

Arlene Kabei, Chief  
Compliance Monitoring and  
Enforcement Section

Enc.

cc: Paula Rasmussen, DTSC., Reg. 4